IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ZAFTR INC. n/k/a SVELLA FINANCIAL CORP.

2500, 500 4 Avenue Southwest, Calgary, Alberta, Canada

Plaintiff,

V

KEVIN JAMESON LAWRENCE, ESQUIRE

2023 N. 2nd St., Suite 301 Harrisburg, PA 17102

BVFR & ASSOCIATES, LLC

2023 N. 2nd St., Suite 301 Harrisburg, PA 17102

JOHN KIRK, ESQUIRE

225 Wilmington-West Chester Pike Suite 200 Chadds Ford, PA 19317

KIRK LAW PLLC

225 Wilmington-West Chester Pike Suite 200 Chadds Ford, PA 19317

Defendants.

CIVIL ACTION No. 2:21-cv-02177-WB

STIPULATION EXTENDING SCHEDULING ORDER DATES

It is hereby stipulated and agreed by and between undersigned counsel for Plaintiff, Zaftr, Inc. n/k/a Svella Financial Corp., Defendants, Kevin Jameson Lawrence, Esquire and BVFR & Associates, LLC, and Defendants John Kirk, Esquire and Kirk Law PLLC, that, subject to the Court's approval, the parties have agreed to the modification of the dates set forth in the Court's Scheduling Order dated August 5, 2021 [ECF No. 25] (the "Order") as follows:

- 1. All fact discovery shall be completed by January 7, 2022.
- 2. Any expert reports are due no later than January 21, 2022. If an expert report is intended solely to contradict or rebut evidence on the same subject matter identified by another party, counsel shall serve such report on counsel for every other party no later than February 4, 2022.
- 3. Any party expecting to offer opinion testimony from lay witnesses pursuant to Federal Rule of Evidence 701 with respect to the issues of liability and damages shall, at the time required for submission of information and/or reports for expert witnesses, serve opposing parties with details and/or documents covering the lay opinions of the Rule 701 witnesses.
- 4. Any discovery depositions of expert witnesses shall be completed by February 18, 2022.
- 5. Any motions for summary judgment and/or Daubert motions shall be filed and served on or before March 4, 2022. If the parties do not plan on filing summary judgment and/or Daubert motions, they shall so report to the Court (Chambers, Room 10614) on or before March 4, 2022.
- 6. Except as set forth above, all other terms of the Court's Order shall remain in full force and effect.

By: /s/ Lewis W. Schlossberg

Joseph G. Poluka, Esq. Lewis W. Schlossberg, Esq. Taylor K. Lake, Esq. Blank Rome LLP One Logan Square 130 N. 18th Street Philadelphia, PA 19103

Attorneys for Plaintiff

By:/s/ Gabriel V. Celli

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-andJason A. Nagi, Esq. (**pro hac vice*) 590 Madison Avenue, 6th Floor New York, NY 10022

Attorneys for Defendants Kevin Jameson Lawrence, Esquire and BVFR & Associates, LLC

By: /s/ Kristen J. Coleman

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Attorneys for Defendants John Kirk, Esquire and Kirk Law PLLC

Dated: November 17, 2021

SO ORDERED:	
/s/Wendy Beetlestone, J.	
WENDY BEETLESTONE, J.	